VASQUEZ BOULEVARD/INTERSTATE 70 SITE WORKING GROUP MEETING

FINAL MEETING SUMMARY
June 3, 1999
Swansea Recreation Center, Denver CO

IN ATTENDANCE

Working Group

Michael Maes, Elyria Neighborhood
Lorraine Granado, Swansea Neighborhood and Cross Community Coalition
Jane Mitchell, State of Colorado Dept. of Public Health and Environment
Barbara O'Grady, State of Colorado Dept. of Public Health and Environment
Bob Litle, Asarco
Celia VanDerLoop, City and County of Denver, Dept. of Environmental Health
Anthony Thomas, Clayton Neighborhood
Beatrice Jacobs (for Joan Hooker), Clayton Neighborhood
Chuck Patterson, Globeville Neighborhood
David Mellard, ATSDR
Sandy Douglas, Cole Neighborhood
Bonnie Lavelle, EPA Region 8
Melissa Muñoz, COPEEN
Frances Hartogh, State of Colorado Attorney General's Office
Linda Larsen, Heller Ehrman (Asarco)

Others

Jeff Myers, Contractor to EPA
Marta Valentine, Contractor to EPA, Project Manager for Phase III Sampling Study
Liz Evans, EPA Region 8
Ted Fellman, EPA Region 8
Art Varnado, EPA Region 8
Joyce Tsuji, Exponent (Asarco)
Glenn Tucker, ATSDR
Nancy Strauss, State of Colorado Dept. of Public Health and Environment
Pat Courtney, EPA Region 8
Marion Galant, State of Colorado Dept. of Public Health and Environment
Mike Wenstrom, EPA Region 8
Fonda Apostolopoulos, State of Colorado Dept. of Public Health and Environment
Dave Folkes, Asarco
Dan Tapia, State of Colorado Attorney General's Office

Facilitators

Mary Margaret Golten
Louise Smart

UPDATES

ATSDR

ATSDR will have information related to its fruit and vegetable consultation later this month. ATSDR will decide whether to do a fact sheet or a formal health consultation and will base this decision on the risk-based sampling data.

Listing of the Site

EPA Headquarters has a contractor preparing responses to all the comments EPA has received regarding listing the site. EPA Region 8 expects to receive a draft of those responses by June 21. EPA will review the comments and responses and decide whether to go ahead with finalized listing.

Community Involvement

Community involvement is currently focused on the sampling that will be done this summer. EPA will be sending out flyers and fact sheets early next week, prior to the mailing of access letters. There is a public meeting scheduled for June 22 at 7:00 PM at Harrington School. Although this meeting will focus on the Cole and Clayton neighborhoods, it will be open to all. EPA will try to attend neighborhood association meetings to provide information about sampling and, later this summer, about the risk assessment.

RISK ASSESSMENT STATUS

Where are EPA and the Working Group in the Risk Assessment process? EPA is currently focused on data collection related to soils in residential yards. The Working Group has received and had an opportunity to review the Risk-Based Sampling data (from eight yards), Phase I and Phase 2 sampling data, and the physical and chemical characterization report. This summer, there will be an intensive sampling effort (Phase 3), including about 3,000 homes. EPA has established risk-based objectives for the site and has developed a final conceptual model.

What is next? EPA needs to complete its data collection (sampling) and the exposure assessment. EPA will evaluate the data and consider the concentration of metals that have been measured to select the contaminants of concern – what are the contaminants that will drive the assessment of risk and drive EPA's cleanup decisions. In order to do this, EPA will look at all available data on the "full suite" or entire list of metals that the laboratories were asked to measure. This includes; (1) 44 samples from the Phase I and Phase II sampling efforts which were analyzed for the full suite of metals; (2) 5% of samples from Phase I and II (approximately 120 samples) which were analyzed for arsenic, cadmium, lead, and zinc as part of the physico-chemical characterization study; (3) samples collected from the 8 properties which were intensively sampled as part of the risk based sampling study. These samples were analyzed for arsenic, cadmium, lead, and zinc. To supplement this information base, EPA recently chose 10 samples of the highest arsenic concentrations which were archived from the risk-based study and analyzed these for the full suite of metals. All available information will be used to select the contaminants of concern. The bio-availability study is a key component of the exposure assessment. EPA will complete a work plan for this study in July; Chris Weis will start the study with pigs in August, which will take 60 days to complete. Since it will take EPA 4 to 5 months to collect the samples from the homes, the time frames for these two efforts will work well together.

EPA is assembling the exposure factors which will be used in the risk assessment, including ingestion rates, inhalation rates, exposure durations, and body weights.

The comment period for the risk-based sampling study ended on April 30. EPA will consider all comments received on this study and will revise the study if necessary.

DRAFT CONCEPTUAL SITE MODEL

EPA presented the revised draft Conceptual Site Model of Potential Human Exposure Pathways which is now the final model. ATSDR has suggested that EPA look at emissions from an existing smelter. EPA's "Other Sources" may include historical smelters, other active smelters, and arsenical pesticides.

Relationship between the Globe Plant and the Vasquez/I-70 Study

EPA will not be evaluating the Globe site since Globe is being studied by the State under the Globeville project. EPA has oversight on that study. EPA recognizes that Globe has the potential for having affected off-facility soils and will use that information to predict areas in the Vasquez/I-70 site where soils may be affected by the past operations of the Globe plant. EPA's comparative soils study will help determine such a prediction. The comparative soils study will compare the soils in the neighborhood with the soils from the Globe plant as well as with arsenical pesticides, and if available, soils from Omaha Grant and/or Argo .

Asarco has conducted an air-modeling study, which the EPA and the State Air Pollution Control Division will review. The Colorado Health Department's Air Pollution Control Division issued Asarco's air emissions permit and thus has publicly available information on emissions. Under the Consent Decree of the State, Asarco is required to clean up yards block by block until the effort reaches a clean block; as a result, the sites (Globeville and Vasquez) will overlap from the State's perspective. Asarco has the right to attempt to prove that the contamination is not the result of their emissions and has submitted such a report to the State. Asarco's report was reviewed by Dr. Drexler for the State. Dr. Drexler's conclusions were that Asarco had not successfully demonstrated that the contamination was not Asarco's; nor did he conclude that the contamination was Asarco's. This data is available to the public. The State offered to do a 2 to 3-hour presentation on the State study and activities at the Globeville site. Currently, the Globe plant is a specialty metals producing business and is no longer a smelter. *The July 15 meeting of the Working Group will include a presentation by the State to summarize its activities at Globe and a presentation by Asarco on the past and current operations of the Globe plant.*

Lorraine Granado urged EPA to read and consider the MRI study, which was prepared in the mid-1980's and was based on operations of the Globe plant prior to the raising of the stacks. She noted that it will be important for the EPA to have accurate and complete information in order for the community to support the conclusions of the risk assessment. She expressed concern that the 1998 air-modeling study would be reflective of present emissions, rather than past emissions. David Folkes explained that the air-modeling study is an historical review of emissions, beginning in 1896 when the Globe plant opened. Bonnie Lavelle said that EPA would review the MRI study.

Comments on Conceptual Site Model

Cumulative risk. Celia VanDerLoop asked how EPA would factor in "cumulative risk" to the community, since the NCP talks about cumulative site risks. Bonnie Lavelle said that EPA looks at the risk associated with the source that is identified at a site. It is not standard EPA guidance to examine risks associated with other sources. The Conceptual Site Model identifies the sources that EPA will evaluate. The decision to take action will be driven by this model. If there are unacceptable risks from the pathways identified in this model, then EPA will determine how to remedy these risks. EPA's decision to manage a site at an appropriate risk level within a range of acceptable risks can take into account other cumulative impacts.

Outdoor air monitoring. David Mellard said that outdoor air monitoring would be needed to help evaluate current total exposure. One of the biggest concerns is the dust kicked up by trucks. He suggested that EPA could look at this as re-introduction of contaminated soil. Bonnie replied that different agencies have authority to regulate air quality. However, the VB/I70 risk assessment will consider soil entrainment into air. EPA will need to coordinate with the State about the State's ability to do air monitoring.

Bonnie explained that the current Conceptual Site Model has shifted some exposure pathways from probable status to definite status, meaning that the EPA will study them (this is indicated by closed dots on the model). She commented that this model takes a conservative approach. She reminded the group that the present effort is focused on the soils portion of the model. Later effort will focus on sediments, surface water, groundwater, and outdoor air.

DISCUSSION/AGREEMENTS ABOUT SUB-GROUP MEETINGS/INPUT TO EPA

In response to a concern expressed about opportunities for input into EPA technical decision making, the Working Group articulated the following objectives and reached the following agreements:

Objectives:

To provide opportunities for technical-level discussions
To ensure that there is strong collaboration and coordination among the agencies and that the agencies work together on technical issues
To maintain the level of trust that has been developed over the past several months through the Working Group
To be both inclusive and efficient
To allow all Working Group members to have the opportunity to know what everyone else is doing, to know where everyone stands, and to hear everyone's opinions
To ensure that the community has access to information and can participate in decision making
To maintain EPA's role as lead regulatory agency at the Vasquez/I-70 site, with responsibility for making the final decision and documenting that decision, while providing the Working Group as an avenue for advice to the EPA
To prevent private meetings between agencies while providing for opportunities for simple and direct communication (such as telephone calls to ask questions, receive clarification of information, and make suggestions), especially between the toxicologists

Agreements:

The Working Group will serve as the inter-agency/community "big team" which serves as a source of advice to EPA and decides which issues should be referred to sub-groups for more detailed discussion.
Sub-group meetings will be held to provide opportunities to hold technical discussions and conduct preparatory work to aid in developing technical strategies and plans.
All Working Group (and contact list) members will receive notice of date, time, location, and topic of sub-group meetings. Working Group members may then decide if they want to and can attend or send someone to attend the sub-group meetings.
Any member of the Working Group can identify the need for a sub-group meeting.
The facilitators will be responsible for communicating information about date, time, location, and topic of sub-group meetings to all Working Group members and individuals on the contact list.
Sub-group meetings will be reported at the Working Group meetings. The meeting summary of the Working Group meeting will capture this reporting; this will serve as documentation of sub-group meetings.
The State and the EPA need to coordinate their work at the two sites (Globeville, where the State is the lead regulatory agency, and Vasquez/I-70, where EPA is the lead regulatory agency). This coordination necessitates meetings between the State and EPA. These meetings will be announced and open to the Working Group.
Unless there is a special need and request, the facilitators will not participate in sub-group meetings.
The facilitators plan and conduct the Working Group meetings for the benefit of all Working Group members. Any Working Group member can contact the facilitators to provide input to the agenda and process for the Working Group meetings. The Working Group should be a means for all Working Group members to communicate and collaborate on what they are doing relevant to this project.
The Working Group supports the concept of informal communication between Working Group members and the EPA through direct phone calls to obtain or share information.

Several Working Group members commented that this discussion reflected the trust that has been built over the past several months and expressed appreciation for the openness of the Working Group process and the improvements in communication that have been occurring.

PHASE 3 SAMPLING PLAN

Sampling Issues to Address

Jeff Myers of Morrison Knudsen has been hired as a consultant to EPA on statistics issues at this site. He used jars of pasta, beads, and beans to illustrate the sampling issues the EPA will address in its sampling plan, including size and numbers of samples and whether to composite the samples and test the composite.

A jar which has 50% black beans and 50% white beans would have areas of clusters of white or black beans. If we were to take a small sample, it would be possible to have a mostly white or mostly black sample, which would not be reflective of the actual distribution in the jar. Therefore, it would be important to take samples that are large enough to have a good chance of getting an accurate reading on the mixture. The sample must have a large enough volume to produce confidence in the reading.

Assuming that in a jar of yellow pasta with little red pieces, the red pieces indicate contamination, it would be possible for a sample to miss the contamination (no red pieces) or indicate that the material is very hot (a cluster of red pieces), neither of which would be representative of the jar as a whole. There are two ways to get a representative sample: (1) To take a large volume of material in the sample; or (2) To take lots of little samples. In a perfect world, we would take the whole yard, mix it up, and send it off to the laboratory; or we would test molecule by molecule. Neither of these two extremes is practical. So we design a sampling plan to try to calculate with a certain level of confidence what is occurring in the yard.

The sampling plan is designed to avoid under-predicting or over-predicting the contamination. EPA is designing a two-stage statistical approach that will provide a level of confidence that we are knowledgeable about the contamination that exists.

Compositing

EPA is proposing to use a compositing approach in the Phase III sampling. This will involve taking approximately 16 samples from each yard, mixing the samples, and testing the mixture. Jeff described a project in Pueblo, where a composite method was used. Most individual samples would not have shown the contamination, while the composite revealed the contamination. In almost all cases, composited samples produce a higher value of concentrations than small discrete samples. The conclusion drawn through this study was that a composite approach is safer for human health and the environment. The EPA sampling plan is based on a composite approach, taking a large enough sample to be representative, with a 95% confidence level. The goal is to ensure that (1) small zones that have high concentrations are not missed; (2) each sample is representative of a given location; (3) enough samples are taken to make sure that the findings are representative of the entire yard. EPA will apply a statistical fudge factor to ensure that dirty yards are not missed. This makes the study biased toward cleaning some yards that do not need to be cleaned, rather than missing a yard that should be cleaned.

EPA plans to take approximately 16 samples from each yard, physically combine these into one sample, and do a laboratory analysis of that composited sample for arsenic, lead, and other contaminants of concern (based on the risk studies). Compositing will enable the EPA to get results much sooner than they would if they had to test each of the 16 samples. EPA's job will be to try to quantify the average to a high degree of confidence.

Comments on the Sampling Plan

Bonnie Lavelle reported on the Technical Meeting on statistics and said that the group had talked about compositing, archiving, and the use of the risk-based sampling data. These issues will be addressed further in the next technical meeting.

Potential dilution. Frances Hartogh asked about the potential dilution that would occur through compositing all 16 samples, especially when there is great variability within a yard. Jeff said that compositing usually provides a higher value of contamination than analysis of individual samples. Bonnie explained that the yard would constitute an exposure unit; EPA will take the average over that unit. Over a lifetime, a person's exposure would be averaged over an entire yard. EPA will design an approach to attain the 95% upper confidence limit on the mean of the yard; (EPA guidance sets a goal of a 90% confidence level), and no more than 20% of the results will identify a yard as dirty when it is actually clean.

Archiving. A suggestion was made at the last Working Group meeting to archive samples or portions of samples so that EPA could do further analysis if the composite sample indicated a need for more specific information. Bonnie described her current thinking about archiving. There are a lot of homes that are clean and a lot of homes that are clearly highly contaminated. The composite will identify these. She believes it would be more useful to spend money on re-sampling the marginal yards than spend money on archiving samples.

Compositing and its relation to hot spots and specific location of contamination. Joyce Tsuji suggested compositing by quadrants of yards rather than compositing the whole yard's samples. Bonnie asked whether it makes more sense to spend the time and money up front to test four composite samples from each of 3000 yards or to go back afterwards and test the "gray" areas. Jane Mitchell raised the concern about how to identify hot spots. Bonnie replied that the expectation is that if there is a hot spot, the composite will show an elevated level of contamination; the hot spot would be cleaned up because the yard would be cleaned up. This raised the statistical question of how high one sample would need to be to show up in the composite and identify a yard as dirty. Joyce Tsuji noted that retention of sub-samples might help avoid having to clean up the whole yard to get rid of a hot spot. Anthony Thomas expressed concern that there may be a hot spot in a part of a yard where a person spends more time, such as in the garden. Bonnie told the Working Group that data in Phase 1 and 2 and the risk-based sampling data showed that garden samples had much lower concentrations of contamination than other parts of the property. Therefore EPA believes that a composite sample over the entire yard would be sufficiently protective. David Mellard said that while he was in agreement over the compositing approach, he wanted to look at it from the point of view that anyone could go anyplace in their yard and put in a garden. Fonda Apostolopoulos offered the suggestion of creating two composites, one from the front yard and one from the back, since children tend to play in the back yard. It was noted that a single composite may not help with identification of the cause of contamination.

Adjacent yards. Celia VanDerLoop asked about how the composite approach would deal with elevated levels of contamination in adjacent yards, near the boundary with highly contaminated yards. Discussion of the next-door edge effects led to the following suggestions: (1) wherever there are highly contaminated properties, adjacent properties should be tested at the fence line; (2) collect more samples for the composite and make the fence line a quadrant.

Increased numbers of samples. The Working Group discussed the possibility of taking more than 16 samples per yard (perhaps 32 samples) to provide more certainty in the results. The increased number of samples, which would be composited, would not be significantly more expensive to collect. This increased number could produce a better estimate of the mean, would help identify a hot spot, would decrease uncertainty in terms of risk, could reduce false positives (classifying a clean yard as dirty), and could better identify the gray areas. The additional cost of taking more samples could be weighed against the savings which may be achieved by identifying fewer false positives.

Confidence limits for Phase I and 2 properties. Lorraine Granado asked about the confidence limits for sampling results from yards which were sampled in Phase 1 and 2, where there were only five samples. Bonnie said that this is a question that EPA also is raising, and that EPA is considering whether to re-sample those properties. She said she would get an answer to the confidence-level question for the Phase 1 and 2 properties.

Allergies/coughing. Beatrice Jacobs asked whether arsenic and lead could cause produce an allergic reaction, such as coughing. She finds that she coughs a lot when she is in her basement. David Mellard said that he did not think that these contaminants would cause coughing and that he would look into this question further.

Pica children. David Mellard raised the concern that exposure from pica behavior is greater than long-term exposure at low levels. A pica child is one whose behavior results in greater ingestion of dirt.

Dust Sampling

Bonnie Lavelle distributed and explained a set of data, "Descriptive Statistics for Intensively Sampled Focal Property Locations 1 through 8." The charts indicate measures of variability for arsenic, lead, cadmium, and zinc. Location 6 is a data set where there is a lot of variability. It includes a computer-calculated mean from the selected sample combinations. The mean is the vertical line; the graph shows the probability of under-predicting or over-predicting (calling a property clean when it is dirty or calling a property dirty when it is clean) given various sampling strategies.

EPA's current thinking is to conduct the soil sampling program before sampling dust. After the XRF soil analysis is produced, EPA will conduct dust sampling on 60 to 90 properties that span concentration ranges.

Bonnie said that there were problems, during the risk-based sampling program, collecting a sufficient mass of dust. For the dust sampling plan, EPA will collect a composite from several living spaces in the home, including left and right of center, and including the basement if it is used (but not the attic). EPA will specify a high volume method of collection and will collect samples from hard surfaces and from carpet. David Mellard said that ATSDR has a set of indoor dust collection protocols, which he will send to EPA. When there are insufficient samples, it is easy to not get a correlation between indoor dust and outdoor soil.

Contaminants of Concern Analysis

Bonnie noted that EPA is still looking for potential other contaminants (besides arsenic and lead).

Alleys

EPA is considering conducting a pilot scale study of alleys near homes with high concentrations of contamination. EPA would collect samples along the alley for the entire block, taking samples from the center of the alley and either side. EPA would target dirt alleys. Chuck Patterson suggested that EPA sample street and gutter dust where trucks go by. Anthony Thomas commented that much of the asphalt in alleys is leftover from street construction. Chuck Patterson asked if anyone has done a TCLP on black gold, which is from old streets and might contain lead.

Commercial Property

Anthony Thomas asked whether EPA would be studying commercial property. Bonnie Lavelle said that EPA would look at commercial property, but that this is not part of the Phase 3 study.

Schedule

In order to conduct sampling in July, EPA presented the following schedule:

A technical sub-group meeting will be held June 10 from 1-3 PM. The purpose will be to review the concepts of sampling for soil, dust, and alley, including: number of samples, compositing, plans for dealing with Phase 1 and 2 sampling, spillover effect to adjacent yards, whether compositing will protect soil pica children, and contaminants of concern analysis. The meeting will start of with a discussion of data quality objectives and will include a discussion on the concept of increasing the number of samples per yard. In preparation for this meeting, EPA will conduct simulations on 20 samples per yard and 32 samples per yard. Lorraine Granado requested that the meeting address the question of confidence limits from Phase 1 and 2 sampling; Bonnie deferred this agenda item to a future meeting, in the interest of focusing on completion of the Phase 3 sampling plan.

- EPA will distribute a written plan by June 21, with comments on this plan to be given to EPA by June 28 (this is too soon for the State, who will get their comments to EPA by July 2). EPA will revise the plan, taking into account others' comments, by July 1 and will incorporate State comments into the Final Plan immediately after July 2.
- EPA will start sampling work on July 19.

COMMUNITY ISSUES

Lorraine Granado told the Working Group that Sandy Douglas will no longer be representing the Cole neighborhood at the Coalition because of time constraints. The Coalition is looking for one or two other Cole representatives. Sandy will continue to represent Cole on and participate in the Working Group.

COMPARATIVE SOILS STUDY

EPA has prepared and distributed a draft plan for the Comparative Soils Study. This study will compare soils from yards with low levels of arsenic and yards with high levels of arsenic to soils at the Globe plant and to Pax. The draft plan identifies what the study is trying to accomplish. Because the EPA wants this study to meet the objectives of a lot of people and agencies and because there is only one sample of Pax material, the EPA wants to make sure the study is comprehensive and meets a number of objectives. Bonnie asked for comments on this draft plan by June 16, and asked that Working Group members call her if they have trouble meeting that deadline.
Bonnie explained that the study, including the chemical analysis of Pax, cannot begin until the plan has her and Chris's approval, and that she will not approve a plan until she has the comments from the community and the agencies to consider. Once the plan is approved, the process of chemical analysis will begin and will take one to one and one-half months. There will be a period of interpreting the results. Results should be available by the end of August and will help determine whether there are finger-printing techniques for these various soils. If this proves to be a good study with good techniques, then EPA may implement it on a larger scale.

Barbara O'Grady and Frances Hartogh raised the issue of the State's desire to have some of the Pax sample for analysis by the State's expert. Bonnie asked the State to define its objectives, so the EPA analysis of the Pax could meet those objectives. The State has a more immediate time frame than the EPA for needed information about Pax related to a future adjudication of whether Asarco will clean up additional properties south of I-70 in the spring of 2000. The State and EPA agreed to have further discussion on the State objectives and time frame and how best to meet them, including whether to conduct the EPA analysis of the Pax early in the comparative soils study, whether to have the State's expert participate in the EPA analysis of the Pax, and/or whether to provide a portion of the sample to the State.

Bonnie told the Group that the Comparative Soils Study will include an analysis of perlite, which was an ingredient of Pax. She distributed copies of a report from Asarco, in the spirit of keeping the Working Group apprised of information given to the EPA and to help explain why the study will examine perlite. Lorraine Granado said that she would like to have confidence that there was no other way perlite could have been put in the soil. Mel Muñoz commented that a lot of gardening soils include perlite. Bonnie responded that EPA is looking for a finger print, a high relationship between the arsenic and perlite.

Celia VanDerLoop said that the State studied characteristics of contaminated soils in South Globeville in 1997-98, using electromicroscopy (the Drexler report). This information is relevant for the Vasquez site. She asked that this report be made available to the Working Group and be reviewed by EPA in preparation for the comparative soils study. Bonnie asked for the benefit of the State's knowledge to help advise EPA in finalizing the Comparative Soils Study plan. Bonnie explained that the Comparative Soils Study would be using the same techniques used by Dr. Drexler, plus additional techniques since the state study was inconclusive. Barbara O'Grady said that a lot of Dr. Drexler's inability to draw a firm conclusion was due to the unavailability of a Pax sample. Bonnie suggested that a technical sub-group meeting be held on the Comparative Soils Study. Barbara said she would distribute the Drexler report.

A technical sub-group meeting will be held on June 14 from 8:30 to 10:30 on the Comparative Soils Study plan. *Comments on the plan will be due to EPA by June 18.*

ACCESS PLAN

Bonnie introduced Marta Valentine who works for Morrison Knudsen and who will serve as project manager for the implementation of the sampling plan. Marta described the process for getting property access. There will be an initial focus on mailings, public meetings, and door-to-door canvassing. The first step is to identify residential properties EPA wants to sample, including all properties in the study area that have not already been sampled. The tax assessor's information will be used for mailing a bilingual letter to property owners. This mailing will include:

- a cover letter explaining the importance of the program, the fact that there is no cost to the property owner, and the steps needed to complete the access agreement and return it to EPA
- the access agreement
- a place for people to designate whether they want to be in the premises when the samples are taken
- a place to designate whether they would like EPA to collect a split sample (so they have a sample to use for their own independent analysis)
- a space for comments
- a support letter from the community leaders explaining they are behind this program and encouraging people to sign up
- an addressed postage-paid return envelope

Marta said that if the property has been sold recently, EPA may send the access agreement to the wrong person, in which case, EPA will ask that the receiver return it to the EPA unsigned so the EPA can take *steps to follow up. There are some properties which are not included in the tax assessor records.* The EPA will follow up with a second mailing, six to eight weeks after the initial one, to those who have not responded, as well as to all the renters. They will give the renters the information about whether the owner has provided access. If the owner has not provided access, the EPA will ask the renters if they want to contact the owner and encourage them to participate.

There will be a meeting June 22 at Harrington School, to answer questions about access. Staff will have all the access agreement papers at that meeting.

Outreach for access will be an ongoing process. There will be future public meetings and more opportunities for providing information about access.

The EPA will go door-to-door for properties that have not been heard from. In some instances, EPA will be prepared to do the sampling on the spot if access is granted; in other instances, EPA will have the papers and conduct sampling later.

Fonda Apostolopoulos and Nancy Strauss made suggestions about including in the mailing information regarding the split option, such as:

- what a split is and what it can be used for (independent analysis)
- a list of laboratories that have been used in the past
- methodologies and protocols for analyzing the samples, since many laboratories do not deal with arsenic on a daily basis

Mel commented that it would empower people to do something with their bag of dirt.

Lorraine Granado suggested that the letter include a statement that the person's name would be kept confidential in order to assure participation by people may be undocumented. Matt Cohn said that EPA will check on what data can be kept confidential. The use of addresses would not be a problem.

Marta asked Working Group members to encourage people to return the access agreement as soon as possible. The faster the EPA gets a response, the faster crews will be in the field conducting the work.

Mel suggested using neighborhood newsletters as a way to get the word out. Sandy Douglas said she would be distributing door-to-door flyers and could distribute access agreements at the same time. EPA's plan is to start with an organized approach to avoid having access agreements distributed outside the study area and to avoid having agreements returned from renters instead of owners. Then follow-up work could be done by community members to help where EPA has not received a response.

Suggestions for door-to-door outreach included: (a) have someone official accompany the outreach worker (the outreach worker will use "contractor for EPA" badges; (b) include outreach workers who can speak Spanish, especially in Swansea and Elyria.

David Mellard suggested that there be a protocol to highlight those properties where sampling analysis shows they have concentrations of contaminants above the emergency removal action levels. Once EPA receives results from the sampling and analysis and sends the results to the residents, then ATSDR will need to send the residents information on the public health significance of the results.

NEXT STEPS

Technical sub-group meetings

June 10, 1:00 pm to 3:00 pm – Discussion of Sampling Plan for Phase 3
June 14, 8:30 am to 10:30 am – Discussion of Comparative Soils Study plan

Comments to EPA

By June 18 on the Comparative Soils Study plan
By June 28 on the Phase 3 Sampling Plan, which EPA will distribute by June 21 (the State deadline is July 2)

Next Working Group meeting will be Thursday, July 15, 8:30 am to 3:00 pm at the Swansea Recreation Center.

MEETING EVALUATION

What went well:

- Information came forth.
- We are getting better at voicing problems and differences and moving toward solutions. This shows real progress. We have built an underlying sense of trust. We need to keep remembering we are arguing about ideas, not about people.
- The Technical sub-group meeting that we had worked well.

Suggestions for improvements:

- Keep breaks to 15 minutes.
- Have more people provide agenda items.